



*Comprehensive conditional access
and digital rights management*

May 9, 2007

Widevine Technologies, Inc.
901 5th Ave, Suite 3400
Seattle, WA 98164

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Open Standard and Separable Security

Dear Chairman Martin:

Consistent with our March 22, 2007 correspondence, Widevine Technologies Inc. is pleased to further inform you that Widevine's Cypher suite of downloadable security solutions are provided on a non-discriminatory and open standard basis.

Widevine has been a leader in promoting the need for an open standard as evidenced by our long standing and close relationship with the Alliance for Telecommunications Industry Solutions (ATIS) and other recognized standards bodies. Widevine currently holds a seat on the ATIS board. We have offered our open interface to ATIS as a framework for developing a global interoperability standard. Widevine also served as co-chair of the IPTV Interoperability Forum (IIF) Digital Rights Management (DRM) taskforce to develop and guide standards and related technical activities that enable interoperability, interconnection, and implementation of IPTV systems.

Moreover, Widevine is part of key DRM-ATIS taskforce that is committed to establishing the foundational building blocks for this open standard DRM framework. A primary goal is to harmonize the standards within other recognized standards bodies, such as Coral Consortium, to create a global standard while maintaining common reliance. ATIS concurrently works with middleware providers to develop open standards for consumer navigation technologies in concert with Widevine's DRM efforts. Through these joint efforts, Widevine and

ATIS are working to ensure that content can be consumed on any consumer electronics platform.

Widevine understands the importance of developing an open, efficient, and secure interoperability standard. That is why Widevine Cypher is provided to our vendors, manufacturers, and customers as an open standard. For example, Widevine routinely publishes an open Application Level Interfaces (API) specification that enables middleware and set top box manufacturers to easily interface with Widevine Cypher. Recently, Widevine submitted our interfaces as a contribution for standardization by ATIS titled "Interoperability Standard Interface." Attached is a list of separable security and navigation related standards either completed or in development with ATIS.

Widevine shares the FCC's objective of establishing a global open standard as evidenced by our significant involvement with ATIS, numerous other recognized standards bodies, and our commitment to providing open standards to our customers.

We welcome the opportunity to meet with you to discuss this very important matter.

Kind Regards,

A handwritten signature in black ink, appearing to read "Brian Baker", with a long horizontal flourish extending to the right.

Brian Baker
CEO
Widevine Technologies

Attachment: ATIS Separable Security and Navigation Standards

Below are some recent and important standards efforts within the ATIS IIF that are particularly important to achieve retail availability of devices used to consume content.

Completed:

- IPTV Scrambling Algorithm Interoperability Specification
- DRM Interoperability Requirements

In process:

- Secure Download Interoperability Specification
- Application Level Interfaces (API) Interoperability Specification
- Distribution of Content
- MetaData Use Cases
- Electronic program Guide MetaData Requirements
- Interoperability Standard Interface